

## REMARKS

### I. Status of the Application

Claims 1-17 are pending in this application. In the January 10, 2008 office action, the Examiner:

A. Rejected claims 1, 5-7, 9-15, and 17 under 35 USC §102(e) as being anticipated by Santosuosso (U.S. Publication No. 2003/0093400; and

B. Rejected claims 2-4, 8, and 16 as being obvious over Santosuosso in view of Yamada (US Publication No. 2006/0058982).

In this response, Applicants have amended claims 1 and 10, and canceled claims 5, 9, 13, and 17. Applicants respectfully traverse the rejection of the claims and request reconsideration in light of the foregoing amendments and following remarks.

### II. Claim 1

Claim 1 was rejected as being anticipated by Santosuosso. Claim 1 has been amended to clarify the invention as defined by claim 1. For the reasons discussed below, Santosuosso fails to teach, show or suggest each and every limitation of claim 1, as amended.

Claim 1 is directed to a system for communicating variable data between a data management system and a document production system. Claim 1 has been amended so that the document production system includes:

a document input station configured to generate a soft document in accordance with an input document;

a document composition engine being configured to generate a document layout in accordance with the soft document;

a document designing station configured to enable proofing and modification of the document layout;

a layout processor configured to generate at least one document in accordance with the document layout, the at least one document being populated with the variable data and being formatted for printing; and

a printer configured to print the at least one document.

Thus, the document production system is configured to generate a document layout that may be used as a template for printing documents containing the variable data. The message bridge enables communication of the variable data between the database management system and the document production system in order to streamline the generation and printing of the documents containing the variable data.

Santosuosso is directed to a method for updating a database from a browser. In particular, Santosuosso is directed to updating information in a database utilizing information from a user's browsing session. (Santosuosso, para. [0008]). The system of Santosuosso includes a database server 170 for managing one or more databases and a client server 140. The client server includes a browser that is configured to link the client server to the database server so that information that is received in the browser, e.g., URL's, may be provided to the database server which then utilizes the input information to update the databases. Accordingly, it appears that Santosuosso is directed to monitoring or tracking the webpages that a user accesses via the browser and to utilize the accessed webpages to determine if the accessed webpages have changed from a previously stored version. Changes in webpages may include

changes to webpage length, changes to images or links on the webpage, changes in HTML tags, redirect tags, etc. (Santosuosso, para. [0036]). The browser is configured to transfer the changed webpage information to the database server so that the database server can update the database information corresponding to the changed webpages. (Santosuosso, para. [0038]).

There is no disclosure or suggestion in Santosuosso of a document production system as claimed in amended claim 1. In the office action, the data management system of claim 1 was equated to the database server 170 of Santosuosso, and the document production system was equated to the client 140 of Santosuosso. The client 140 of Santosuosso, however, was not disclosed as being capable of receiving an input document and to generate a document layout or template from the input document. Moreover, there is no disclosure in Santosuosso that the client 140 is configured to allow the proofing or modification of the document template and to generate documents for printing from the document template that includes the variable data from the data management system.

Moreover, there is no disclosure in Santosuosso that the client 140 (equated to the document production system of claim 1) is configured to receive variable data from the database server 170 (equated to the data management system). According to claim 1, the document production system is configured to generate documents that include the variable data obtained from the database of the data management system. In Santosuosso, the browser of the client is

configured to allow the navigation between various web servers 110 and to locate network addresses (URL's) on the web servers. The information from accessed webpages is provided to the browser for display on the client 140. The browser, in turn, is connected to the database server 170. The browser provides the information received from the web servers to the database server which, in turn, uses the information from the web servers to update information about the network addresses on the web server. There is no disclosure in Santosuosso that data from the databases that are managed by the database server 170 is ever provided to or obtained by the client 140. Contrary to the invention as claimed in claim 1, the variable data of Santosuosso is only sent from the client 140 to the database server 170 so that the database server may update the information.

Accordingly, Santosuosso fails to teach, show or suggest each and every limitation of claim 1, as amended. Therefore, the anticipation rejection of claim 1 over Santosuosso should be withdrawn. In addition, although Yamada was not cited as anticipating claim 1, Yamada suffers from at least the same deficiencies of Santosuosso with regard to claim 1, as amended. For example, Yamada fails to disclose a document input station, a document composition station, a document design station, a layout processor, a printer, etc.

**III. Claim 10**

Claim 10 was rejected as being anticipated by Santosuosso as well.

Claim 10 has been amended in a manner similar to claim 1. In particular, claim 1 has been amended to include the following limitations:

generating a document layout at a document input station of a document production system, the document layout being generated in accordance with a soft document;

receiving the document layout at a document designer station of the document production system, the document designer station being configured to enable the proofing and modification of the document layout;

generating at least one document in accordance with the proofed document layout at a layout processor of the document production system, the at least one document including the variable data; and

printing the at least one document at a printer of the document production system;

Thus, claim 10, as amended, includes limitations similar to those found in amended claim 1. Therefore, the arguments presented above with regard to claim 1 are applicable to claim 10, as amended. Accordingly, for at least those reasons presented above in connection with claim 1, it is respectfully submitted that the rejection of claim 10 over Santosuosso should be withdrawn as well.

**IV. Claims 2-4, 6-8, 11, 12, 14-16**

Claims 2-4, 6-8, 11, 12, 14-16 were rejected as being anticipated by Santosuosso or rendered obvious by Santosuosso in view of Yamada. Claims 2-4, 6-8, 11, 12, 14-16 depend directly or indirectly from and incorporate all of the limitations of their respective base claims 1 and 10. Therefore, for at least those reasons presented above in connection with claims 1 and 10, it is respectfully

Amendment  
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submitted that the rejection of claims 2-4, 6-8, 11, 12, 14-16 over the prior art should be withdrawn as well.

**V. Conclusion**

For the reasons set forth above, all pending claims have been amended and are patentable over all references of record. Reexamination and allowance of all pending claims are earnestly solicited.

Respectfully submitted,  
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